

FREEDMAN NORMAND FRIEDLAND LLP

Ivy T. Ngo (*pro hac vice*)
Velvel (Devin) Freedman (*pro hac vice*)
1 SE 3rd Ave., Suite 1240
Miami, Florida 33131
Telephone: (786) 924-2900
ingo@fnf.law
vel@fnf.law

WILLKIE FARR & GALLAGHER LLP

Andrew J. Lichtman
Charles D. Cording (*pro hac vice*)
787 Seventh Avenue
New York, New York 10019
Tel: (212) 728-8000
Fax: (212) 728-8111
alichtman@willkie.com
ccording@willkie.com

POMERANTZ LLP

Joshua Silverman
Christopher Tourek
10 South LaSalle St., Ste. 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
jbsilverman@pomlaw.com
ctourek@pomlaw.com

Counsel for Defendants

Counsel for Lead Plaintiff and the Class

-additional counsel on signature page-

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Lead Plaintiff John V. Levon and Defendants CorMedix Inc., Khoso Baluch, Robert Cook, Matthew David, Phoebe Mounts, John L. Armstrong, and Joseph Todisco (collectively, “Defendants”), through their undersigned attorneys, hereby agree and stipulate to the following:

WHEREAS, on June 30, 2025, the Court issued an Opinion and Order denying Defendants’ motion to dismiss the Third Amended Complaint (ECF Nos. 114, 115);

WHEREAS, on July 23, 2025 the Court entered the parties’ proposed Pretrial Scheduling Order setting forth deadlines for discovery (ECF No. 127);

WHEREAS, on July 23, 2025, the Court issued a Text Order stating that the “Opinion and Order were entered in error” and “direct[ing] the Clerk of Court to remove the Opinion and Order . . . from the docket” (ECF No. 126); and

WHEREAS, the Court’s July 23, 2025 Text Order further stated that “[a] subsequent Opinion and Order will follow”;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, as follows:

1. In light of the withdrawn Opinion and Order, the Court vacates the July 23, 2025 Pretrial Scheduling Order (ECF No. 127), including Defendants’ deadline to respond to Lead Plaintiff’s Third Amended Complaint on July 28, 2025, and any deadlines to respond to discovery; and

2. The parties will submit a revised schedule by the earlier of thirty (30) days from the entry of this order or five (5) business days following the issuance of the Court’s subsequent decision on Defendants’ motion to dismiss the Third Amended Complaint.

Dated: July, 25, 2025

By: /s/ Joshua Silverman

Joshua Silverman
Christopher Tourek
POMERANTZ LLP
10 South LaSalle St., Ste. 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
jbsilverman@pomlaw.com
ctourek@pomlaw.com

Ivy T. Ngo (*pro hac vice*)

Velvel (Devin) Freedman (*pro hac vice*)
FREEDMAN NORMAND FRIEDLAND LLP
1 SE 3rd Ave., Suite 1240
Miami, Florida 33131
Telephone: (786) 924-2900
ingo@fnf.law
vel@fnf.law

Thomas H. Przybylowski
600 Third Avenue
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
tprzybylowski@pomlaw.com

Counsel for Lead Plaintiff and the Class

Brian Schall (*pro hac vice forthcoming*)
THE SCHALL LAW FIRM
1880 Century Park East, Suite 404
Los Angeles, California 90067
Telephone: (424) 303-1964
brian@schallfirm.com

Additional Counsel for Lead Plaintiff

SO ORDERED this _____ date of _____, 2025

CATHY L. WALDOR
United States Magistrate Judge